IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

JEFFREY WONSER,

Plaintiff,

V.

CHARLES L. NORMAN, et al.,

Defendants.

Case No.: 2:24-cv-02160

Judge Sarah D. Morrison

Magistrate Judge Elizabeth A. Preston Deavers

JEFFREY WONSER'S MOTION FOR LEAVE INSTANTER TO FILE AN AMENDED AND SUPPLEMENTAL COMPLAINT

Plaintiff Jeffrey Wonser respectfully moves for leave to file his first Amended and Supplemental Complaint, ECF #20.1

The supplemental complaint is necessary to reflect Defendants' ongoing—and blatant—violations of the First Amendment, including their rejection of his most recent vanity-plate application on November 1, 2024.

Mr. Wonser's amendments also (1) clarify that he is seeking relief on an Equal Protection theory; and (2) provide additional details bearing on arguments raised in Defendants' motion for judgment on the pleadings, permitting the Court to address those issues more definitively on its first review, rather than requiring amendments and another round of briefing in the event the Court finds any deficiencies in the initial Complaint.

Mr. Wonser therefore requests the Court's leave to amend and supplement his complaint.

¹ Consistent with Loc.R. 7.3, Mr. Wonser has identified the amendment as a filing to which other parties might reasonably be expected to give their consent and solicit their consent to the filing on November 4. Defendants however, have not consented to amendment.

Respectfully submitted,

/s/Brian D. Bardwell

Brian D. Bardwell (0098423) Speech Law, LLC 4403 Saint Clair Ave, Suite 400 Cleveland, OH 44103-1125 216-912-2195 Phone/Fax brian.bardwell@speech.law Attorney for Plaintiff Jeffrey Wonser

CERTIFICATE OF SERVICE

I certify that on November 8, 2024, this document was served on opposing counsel as provided by Fed. R. Civ. P. 5(b)(1).

/s/Brian D. Bardwell

Brian D. Bardwell (0098423) Attorney for Plaintiff Jeffrey Wonser